



United States Attorney
Southern District of New York

50 Main Street, Suite 1100
White Plains, New York 10606

December 29, 2023

By ECF and EMAIL

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
Hon. Charles L. Briant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Jahreek Bush*, 23 Cr. 545 (KMK)

Dear Judge Karas:

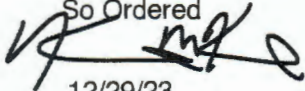
At the last status conference in the above-captioned matter, December 4, 2023, the Court instructed then-counsel for Mr. Bush, Elizabeth K. Quinn, to file a status letter by today, December 29, 2023, indicating whether she intended to file motions in this matter on her client's behalf. The Court also excluded time from December 4, 2023 through today, December 29, 2023, pursuant to 18 U.S.C. § 3161(h)(7)(A) in the interest of justice.

Ms. Quinn has since been substituted as counsel for Mr. Bush by Theodore S. Green. Today, Mr. Green asked the Court for an extension of time to file the status letter to January 19, 2023, and consenting to an exclusion of time under the Speedy Trial Act to that date. *See* Dkt. No. 20.

Accordingly, the Government respectfully requests an exclusion of time from December 29, 2023 until January 19, 2023 pursuant to 18 U.S.C. § 3161(h)(7)(A) so that defense counsel may review discovery, consult with the defendant, and consider whether to file motions in this matter. The ends of justice served by the granting of the continuance requested outweigh the interests of the public and defendant in a speedy trial. As noted above, defense counsel consents to this request.

Granted. Time is excluded, in the interests of justice, until 1/19/24 to allow newly appointed counsel adequate time to review the discovery. The interests of justice from this exclusion outweigh Mr. Bush's and the public's interests in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered


12/29/23

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 

Kathryn Wheelock
Assistant United States Attorney
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cc: Theodore S. Green, Esq. (by ECF and Email)